

# LAW OFFICE OF DARREN WOLF, P.C.

DARREN WOLF  
CHRISTIANNE EDLUND

1701 N. MARKET STREET  
SUITE 210  
DALLAS, TEXAS 75202

MAIN: 214-346-5355  
FAX: 214-346-5909

## MEMO ENDORSED

May 14, 2021

The Honorable Valerie E. Caproni  
U.S. District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, N.Y. 10007

*Via ECF Filing*

RE: *John Doe v. Sisters of St. John the Baptist*  
Civil Action No. 1:21-CV-2451-VEC  
Pending in U.S. District Court, Southern District of New York.

Your Honor:

I represent Plaintiff, John Doe, in the above-captioned matter. I write the Court today in order to request a brief adjournment of the initial conference before Your Honor, which is currently scheduled for May 21, 2021. For the reasons cited below, I make the request for all parties and have discussed this letter motion today with opposing counsel, Elaine Chou.

This case was filed on March 22, 2021 and brought pursuant to the New York Child Victims Act. We obtained agreement from counsel for Defendant to accept service of summons on behalf of Defendant. The waiver of service was signed on April 19, 2021 and is on file. As such, Defendant has yet to make an appearance in the case as their answer is not due until mid-June.

Additionally, my team and I experienced some difficulty and inefficiency with communicating notices from the ECF system due primarily to all of us working remotely due to Covid-19. We are correcting the issues now. As such, we have not purposely ignored or disregarded the court and mean no disrespect to the Court for just becoming aware of the case management order deadline today.

Granting this request will not adversely affect the parties or affect any other pending deadlines. Plaintiff's counsel respectfully requests that the time to submit the joint letter and case management plan be extended to July 1, 2021 and the hearing date be reset to July 9, 2021.

We thank you in advance for considering this request.

Sincerely,



Darren Wolf  
*Attorney for Plaintiff*

cc: Elaine Chou, Esq.  
*Attorney for Defendant*

The initial pretrial conference, currently scheduled for Friday, May 21, 2021, at 10:30 A.M., is hereby adjourned to **Friday, June 4, at 11:00 A.M.** Pre-conference submissions are due no later than **Thursday, May 27, 2021**. For the conference dial in information and a description of the requirements of the pre-conference submissions, the parties should consult the Court's Order at docket entry 4.

Defense counsel must file a notice of appearance by no later than **Friday, May 21, 2021**. By no later than **Wednesday, May 19, 2021**, Plaintiff's counsel must serve this endorsement on Defense counsel by email and file proof of service on the docket.

SO ORDERED.



Date: May 14, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE